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**UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF CALIFORNIA**

Chelsea, LLC, Mark Russo, Allen Loretz,
and Ivan Simpson, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

Regal Stone, Ltd., Hanjin Shipping, Co.,
Ltd., Conti Cairo KG, NSB Neiderelbe,
Synergy Maritime, Ltd. *In Personam*; M/V
Cosco Busan, their engines, tackle,
equipment, appurtenances, freights, and
cargo *In Rem*,

Defendants.

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) Court File No. C-07-5800-SC
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)

**NOTICE OF REQUEST FOR JUDICIAL
REVIEW IN ACCORDANCE WITH
F.R.C.P. SUPPLEMENTAL RULE C**

Pursuant to Rule C of the Supplemental Admiralty Rules, as well as Admir. L.R. 3-1(e) and 3-2 of this Court, Plaintiffs, Chelsea, LLC, Mark Russo, Allen Loretz, and Ivan Simpson ("Plaintiffs"), hereby give notice to the Clerk that it requests judicial review of the Verified First Amended Complaint *in rem* and *in personam* that Plaintiffs have filed in this matter, as well as Plaintiffs' applications for an order to issue a warrant for the arrest of the vessel COSCO BUSAN, a commercial container vessel, IMO number 9231743, 65131 gross tonnage, year of build 2001, her engines, tackle, furniture, apparel (hereinafter the "Vessel" or "COSCO BUSAN") and other supporting documents.

As set out more fully in the Verified First Amended Complaint, there is a dispute under Rule C of the Supplemental Admiralty Rules of the Federal Rules of Civil Procedure as to the default by *in personam* defendants Regal Stone, Ltd., Hanjin Shipping, Co., Ltd., Conti Cairo KG, NSB Neiderelbe, Synergy Maritime, Ltd. (collectively "Defendants") arising out of the oil spillage in the San Francisco Bay that was caused by the COSCO BUSAN on November 7, 2007. Plaintiffs assert a maritime lien against the Vessel under Rule C of the Supplemental Admiralty Rules.

Review is requested because the Vessel is a transient commercial cargo vessel that is presently in San Francisco Bay but which may depart the Northern District at any time. Consequently, Plaintiffs request that the assigned judge, or if the assigned judge is unavailable, any available judge, review and issue the orders requested herein today.

Given the highly mobile nature of the Vessel, the departure of which from this Court's jurisdiction would deprive the Court of *in rem* jurisdiction over the Vessel, time is therefore of the essence.

Rule C (3) of the F.R.C.P. Supplemental Rules for Certain Admiralty and

Maritime Claims, provides for the judicial review of the Verified Complaint *in rem*, and

If the conditions for an action *in rem* appear to exist, an order so stating and authorizing a warrant for the arrest of the vessel or other property that is the subject of the action shall issue and be delivered to the clerk who shall prepare the warrant and deliver it to the marshal for service.

See also Northern District Admiralty Rule 3-1(a)(b) and (d).

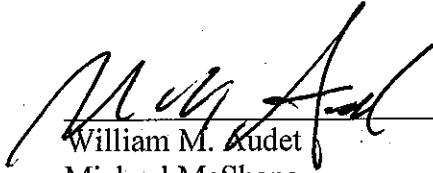
The Verified First Amended Complaint filed in this action satisfies all of the requirements of the Supplemental Rule C -- it is verified, describes "with reasonable particularity" the Vessel, Plaintiffs' claims, and states that the Vessel is or will be within the district during the pendency of the action.

Plaintiffs therefore requests pursuant to Rule C of the Supplemental Admiralty Rules and Rules 3-1(e) and 3-2 of the Admiralty Rules of this Court that the judge assigned, or any judge available if the assigned judge is not available, review Plaintiffs' Verified First Amended Complaint and *ex parte* applications for arrest of the Vessel and appointment of a substitute custodian and issue the appropriate orders to effect the arrest and keeping of the Vessel.

Respectfully submitted,

Dated: November 19, 2007

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